

**Congress of the United States**  
**House of Representatives**

COMMITTEE ON OVERSIGHT AND REFORM

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April 12, 2022

The Honorable Lina M. Khan  
Chair  
Federal Trade Commission  
600 Pennsylvania Avenue, N.W.  
Washington, D.C. 20580

Dear Chair Khan:

We are writing to share evidence of concerning business practices by the Washington Commanders uncovered during the Committee’s ongoing investigation into workplace misconduct at the team. Evidence obtained by the Committee, including emails, documents, and statements from former employees, indicate senior executives and the team’s owner, Daniel Snyder, may have engaged in a troubling, long-running, and potentially unlawful pattern of financial conduct that victimized thousands of team fans and the National Football League (NFL).

According to information and documents obtained by the Committee, for over a decade, Commanders executives may have withheld millions of dollars in refundable security deposits owed to customers upon the expiration of their multi-year seat leases and may have taken steps to prevent customers from collecting these deposits. According to a former team executive, the Commanders “failed to properly refund those security deposits intentionally and took various steps to retain as much of that money as possible.”<sup>1</sup> Documents indicate that as of 2016, the team may have retained up to \$5 million in deposits from approximately 2,000 customers.

Information and documents obtained by the Committee further suggest that the Commanders concealed revenues that were owed to the NFL as part of a revenue-sharing agreement that redistributes revenues to 32 teams in the League and helps set salaries for the League’s football players. According to the former executive, the team maintained “two sets of books”—one that was shared with the NFL but underreported certain ticket revenue, and another internal set of books that included the complete and accurate revenue and was “shown to Mr. Snyder.”<sup>2</sup> Another former team employee informed the Committee that “it was known and/or

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<sup>1</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

<sup>2</sup> *Id.*

rumored in the office that there was ‘moving around’ of money regarding tickets,” and stated that she told an outside investigator hired by the Washington Commanders about this issue in 2020.<sup>3</sup>

Documents indicate that the revenue gained by the team through these practices was known internally as “juice.”<sup>4</sup>

Given the Federal Trade Commission’s (FTC) authority to investigate unfair or deceptive business practices, we are providing the information and documents uncovered by the Committee for your review, to determine if the Commanders violated any provision of law enforced by FTC and whether further action is warranted.<sup>5</sup> We request that you take any other action you deem necessary to ensure that all funds are returned to their rightful owners and that those responsible are held accountable for their conduct.

### *The Committee’s Investigation*

On October 21, 2021, the Committee on Oversight and Reform launched an investigation into allegations of a decades-long hostile workplace culture at the Commanders, the NFL’s handling of this matter, and the NFL’s role in setting and enforcing workplace standards across the League.

In July 2020, Daniel Snyder announced the hiring of Beth Wilkinson, a prominent D.C. attorney and former federal prosecutor, and her law firm Wilkinson Stekloff, to conduct an internal investigation into “all forms of workplace misconduct” at the Commanders, including sexual harassment as well as “bullying, abusive actions and an employee’s inability to report inappropriate behavior.”<sup>6</sup> One month later, the NFL took over the investigation, purportedly to ensure that “the results are thorough, complete, and trusted by the fans, the players, our employees and the public.”<sup>7</sup>

In a break with recent precedent on handling matters of public interest, the NFL refused to release the full findings of Ms. Wilkinson’s investigation. Instead, after Ms. Wilkinson and

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<sup>3</sup> Letter from Rachel Engleson to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20R.%20Engleson%20to%20CBM%20%28Redacted%29.pdf>).

<sup>4</sup> Email from Stephen Choi to Jason Friedman et al. (May 6, 2014) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/May%202014%20Email%20%28Redacted%29.pdf>).

<sup>5</sup> Federal Trade Commission, *A Brief Overview of the Federal Trade Commission’s Investigative, Law Enforcement, and Rulemaking Authority* (May 2021) (online at [www.ftc.gov/about-ftc/mission/enforcement-authority](http://www.ftc.gov/about-ftc/mission/enforcement-authority)).

<sup>6</sup> *How Can the Washington NFL Team’s Internal Review Be Independent? Legal Experts Weigh In*, Washington Post (July 22, 2020) (online at [www.washingtonpost.com/sports/2020/07/22/washington-nfl-internal-review-daniel-snyder-beth-wilkinson/](http://www.washingtonpost.com/sports/2020/07/22/washington-nfl-internal-review-daniel-snyder-beth-wilkinson/)).

<sup>7</sup> *NFL Takes Over Investigation into Washington Football Team*, Sports Illustrated (Aug. 31, 2020) (online at [www.si.com/nfl/2020/09/01/nfl-takes-over-washington-football-team-investigation-sexual-harrasment](http://www.si.com/nfl/2020/09/01/nfl-takes-over-washington-football-team-investigation-sexual-harrasment)).

her team interviewed more than 150 witnesses and collected hundreds of thousands of documents over the course of ten months, the NFL issued a four-page press release that contained vague and conclusory findings of the investigation, including that the Commanders' workplace was "highly unprofessional," that "[b]ullying and intimidation frequently took place," and that "senior executives engaged in inappropriate conduct themselves." In releasing these findings, the NFL asserted that "[n]one of the managers or executives identified as having engaged in misconduct is still employed at the club."<sup>8</sup> To date, the NFL has refused to provide the Committee with the full findings of Ms. Wilkinson's investigation, and both the NFL and the Commanders have taken steps to withhold key documents and information from the Committee.

Faced with the NFL's and the team's obstruction, the Committee has obtained information and documents from other sources, including numerous former employees. The Committee's investigation has revealed a longstanding culture of impunity among top executives at the Commanders—from pervasive sexual harassment and other workplace misconduct to potential financial misconduct.<sup>9</sup>

The purpose of the Committee's ongoing investigation is to inform legislative efforts to strengthen protections for employees across all workplaces. In particular, the Committee's investigation will inform legislative efforts to prevent and address toxic work environments and workplace investigation processes; strengthen protections for women in the workplace; and address the use of non-disclosure agreements to prevent the disclosure of unlawful employment practices, including sexual harassment.

### *Interview of Former Team Executive*

As part of its investigation, on March 14, 2022, the Committee conducted a transcribed interview with former Commanders sales executive Jason Friedman, a 24-year veteran of the organization—and one of Mr. Snyder's longest serving employees—who began his employment in 1996. Mr. Friedman, who started as an intern under former owner Jack Kent Cooke, described working for his hometown team as "a childhood dream." He was promoted, first by Mr. Cooke and then repeatedly by Mr. Snyder, eventually becoming Vice President of Sales and Customer Service—the position he held at the time of his separation in October 2020. In this capacity, Mr. Friedman oversaw sales and customer service for all regular and premium seating at FedEx Field, including club, dream, and loge seats.<sup>10</sup>

During his transcribed interview with Committee staff, Mr. Friedman provided a detailed account of the Commanders' toxic work environment, culture of impunity, and lack of

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<sup>8</sup> National Football League, *Press Release: NFL Announces Outcome of Washington Football Team Workplace Review* (July 1, 2021) (online at [www.nfl.com/news/nfl-announces-outcome-of-washington-football-team-workplace-review](http://www.nfl.com/news/nfl-announces-outcome-of-washington-football-team-workplace-review)).

<sup>9</sup> See, e.g., Committee on Oversight and Reform, *Press Release: At Committee Roundtable, Former Washington Commanders Employees Detail Widespread Sexual Harassment by Top Executives* (Feb. 3, 2022) (online at <https://oversight.house.gov/news/press-releases/at-committee-roundtable-former-washington-commanders-employees-detail-widespread>).

<sup>10</sup> Committee on Oversight and Reform, *Transcribed Interview of Jason Friedman* (Mar. 14, 2022).

accountability by Commanders executives. He also described a pattern of deeply concerning business practices that were directed by senior leadership, including Mr. Snyder. He explained:

You know, the team through our roller coaster were—we were on top of NFL attendance and revenues from 1997 to 2005 or 2006, and then things started to slowly go downhill. And some of these practices really started when things started to get a little tougher for the team financially.<sup>11</sup>

According to Mr. Friedman, team executives began encouraging potentially deceptive practices to generate non-sharable revenue when “[g]ross season ticket sales started to decline around 2009 creating a smaller top line” for the Commanders.<sup>12</sup> Mr. Friedman also provided contemporaneous documents and a letter to the Committee with additional information.

### *Failing to Return Security Deposits to Customers*

Mr. Friedman provided the Committee with information and documents indicating that the Commanders routinely withheld security deposits that should have been returned to customers who had purchased multi-year season tickets for specific seats, referred to as seat leases.

According to Mr. Friedman, in 1997, to help finance the new FedEx Field stadium under then-owner Jack Kent Cooke, the Commanders began requiring fans to enter into multi-year leases for certain premium seating, including club and loge seats, as well as private skybox suites.<sup>13</sup> In order to secure these leases, fans were required to pay a one-time refundable security deposit of 25% of the price of the seats for one year.<sup>14</sup>

Internal documents obtained by the Committee reveal that at least some of the Commanders’ lease agreements provided that security deposits “shall be returned to Licensee within thirty (30) days after the expiration of the term of this Agreement, or any renewal term.”<sup>15</sup>

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<sup>11</sup> *Id.*

<sup>12</sup> Letter from Jason Friedman to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20J.%20Friedman%20to%20CBM%20%28Redacted%29.pdf>).

<sup>13</sup> E.g., *Redskins Raise Ticket Prices*, Washington Post (Feb. 15, 2001) (online at [www.washingtonpost.com/archive/sports/2001/02/15/redskins-raise-ticket-prices/df3e9577-321f-4869-9e5b-d9cc31d6d06d/](http://www.washingtonpost.com/archive/sports/2001/02/15/redskins-raise-ticket-prices/df3e9577-321f-4869-9e5b-d9cc31d6d06d/)); *The Pie in the Skyboxes Is Definitely a La Mode*, Washington Post (Oct. 18, 1987) (online at [www.washingtonpost.com/archive/sports/1987/10/18/the-pie-in-the-skyboxes-is-definitely-a-la-mode/f3c98b80-91f3-4ded-a324-308203b519cb/](http://www.washingtonpost.com/archive/sports/1987/10/18/the-pie-in-the-skyboxes-is-definitely-a-la-mode/f3c98b80-91f3-4ded-a324-308203b519cb/)). FedEx Field consists of general admission seats and premium seats, including club seats, dream seats, loge seats, and private skybox suites.

<sup>14</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

<sup>15</sup> Contract for Executive Suite between WFI Stadium, Inc. and redacted licensee (Oct. 17, 2005) (NFL-00141591 to NFL-00141594) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2005%20Contract%20for%20Executive%20Suite%20%28Redacted%29.pdf>).

Mr. Friedman stated that after Mr. Snyder purchased the team in 1999, rather than return the security deposits to customers at the end of the lease term, team executives directed employees to establish roadblocks to prevent customers from obtaining the security deposits they were due—effectively allowing the team to retain that money. Mr. Friedman explained:

Those security deposits, per the terms of the contract, are refundable at the end of the contract provided that the licensee has met their obligations, i.e., paid their bill each year and not damaged their seat.

The team failed to properly refund those security deposits intentionally and took various steps to retain as much of that money as possible mainly by taking advantage of the passage of time.<sup>16</sup>

Mr. Friedman described how the Commanders created artificial barriers to discourage customers from requesting the return of their deposits—harming both current and former ticketholders. For example, Mr. Friedman stated that team executives instructed him to avoid conversations regarding security deposits with customers otherwise entitled to a refund. Although the team routinely allowed customers to use email to facilitate other transactions, it would not accept refund requests by email and instead required leaseholders to submit their refund requests through “U.S. mail or FedEx.” According to Mr. Friedman, after 2000, the Commanders no longer required security deposits for new club seat lease agreements but failed to inform all leaseholders of the change. Rather than inform customers who were unaware of the policy change at the time of their seat lease renewal or refund or credit the deposits to customers’ accounts upon renewal, the team would collect full payment for the renewed leases while retaining the security deposits.<sup>17</sup>

Mr. Friedman, who oversaw the processing of security deposits and refunds, explained how the Commanders also took advantage of customers who mistakenly believed the deposits were non-refundable or who forgot or were unaware of deposits on their account. He stated:

[M]any of them [customers] forgot about it. In many cases, with corporate accounts, the attention name on the account would change over time. So the person who entered into the lease and agreed to pay the security deposit would be different from the person who was managing the account when the lease expired ten years later, and the new point of contact wouldn’t know to ask for the security deposit.

One of the other reasons the team was able to do this is because people would pass tickets down in their family. So, you know, a mother passes the tickets down to her daughter, and as she does that, doesn’t tell her that there’s a security deposit on the account. And then when the daughter decides not to renew the tickets, she doesn’t

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<sup>16</sup> *Id.*

<sup>17</sup> Letter from Jason Friedman to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20J.%20Friedman%20to%20CBM%20%28Redacted%29.pdf>).

know to ask for her security deposit back. And, again, the team just keeps it and doesn't go out of their way to try and refund the money.<sup>18</sup>

He continued:

Another reason that these security deposits would be retained is someone might pass away and their heirs or relatives don't know to ask for the security deposit in return.

So basically, the team is holding on to these security deposits, many of which should be back in the hands of the customers or former customers.<sup>19</sup>

Mr. Friedman recalled only one instance in his 24-year tenure when the Commanders took affirmative steps to return the security deposits to their rightful owners. Mr. Friedman explained that the team's leadership realized one of the team's three local jurisdictions—the District of Columbia, Maryland, or Virginia—had amended its laws to require notice to leaseholders of security deposits available for refund. As a result, the team attempted to provide notice to leaseholders in that single jurisdiction as “passively” as possible. He explained:

I remember at one point over the last probably eight years, there was a scramble to reach out as passively as possible to everybody that had a security deposit on file that was refundable in one of the three local jurisdictions, DC, Maryland, or Virginia; that somebody had figured out that the laws were different in one from the other two, and we batched out letters to the last address we had on file saying that if you wanted your security deposit back, that you needed to call.<sup>20</sup>

However, according to Mr. Friedman, even when leaseholders called to request refunds from the team, the Commanders intentionally created additional obstacles to reduce the likelihood that the leaseholders would follow through on their requests—resulting in only a small fraction of the deposits being returned to customers.<sup>21</sup> Mr. Friedman explained:

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<sup>18</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022); *see also* Letter from Jason Friedman to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20J.%20Friedman%20to%20CBM%20%28Redacted%29.pdf>).

<sup>19</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

<sup>20</sup> *Id.*; *see also* Letter from Jason Friedman to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20J.%20Friedman%20to%20CBM%20%28Redacted%29.pdf>).

<sup>21</sup> Letter from Jason Friedman to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20J.%20Friedman%20to%20CBM%20%28Redacted%29.pdf>).

And then when you called, we told you that you needed to send us a letter. But that didn't—that didn't make a large dent in the security deposit universe. That may have impacted what was left there by 5 to 10 percent.<sup>22</sup>

The Commanders' practice of collecting deposits for most categories of seats ended approximately one year after Mr. Snyder acquired the team from Mr. Cooke in 1999. Nonetheless, according to Mr. Friedman, and consistent with documents he provided to the Committee, as of July 2016 the team had unreturned security deposits for "around 2,000 accounts" belonging to customers and fans totaling "approximately \$5 million."<sup>23</sup>

### ***Converting Security Deposits into Non-shareable Revenue***

According to Mr. Friedman, the Commanders would also improperly convert certain unclaimed security deposits into revenue for the team to use for other purposes.<sup>24</sup> Mr. Friedman stated that some team executives used the term "juice" to describe this practice, which entailed identifying revenue to be intentionally misallocated in its accounting system and applied to unrelated events. When asked to explain the meaning of "juice," Mr. Friedman responded:

A: Juice is a term we used in the office for extra money for the company.

Q: What do you mean by extra money?

A: Money that wasn't being used to pay for something or wasn't—money that wasn't being used on our accounting ledger to match up with a product or service that was actually being provided.<sup>25</sup>

Mr. Friedman stated that Mr. Snyder and Mitch Gershman, Mr. Friedman's former supervisor and then-Chief Operating Officer for the Commanders, would specifically instruct him to:

Go identify security deposits that are on dormant accounts where, in my estimation, the likelihood of the customer coming forward and asking for their deposit back is as close to zero as possible, and then return the security deposit in the system and convert the credit that would then be on the customer's account into juice.

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<sup>22</sup> *Id.*

<sup>23</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

<sup>24</sup> Letter from Jason Friedman to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20J.%20Friedman%20to%20CBM%20%28Redacted%29.pdf>).

<sup>25</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

The money would then be allocated to a similar license fee, handling fee, interest fee. It would get converted into something where, A, we didn't have to share it with the league, and B, there was no outstanding obligation related to it. Meaning we didn't have to issue out a ticket to a customer related to that line item.<sup>26</sup>

According to Mr. Friedman, the practice of "juicing" security deposits occurred over the course of several years. He recalled at least one occasion where Mr. Gershman instructed him to identify a significant amount of money in unclaimed deposits to convert into "juice." He stated:

There was one particular season where towards the end of the season, Mitch Gershman came to me and said, go get us another 100 grand in juice out of the security deposits.<sup>27</sup>

Mr. Friedman understood that the practice of requesting "juice" from security deposits would occur when team executives believed the Commanders "were a little bit behind on our sales numbers."<sup>28</sup> He stated that this practice was done at the direction and for the benefit of Mr. Snyder:

Q: Who would instruct you to identify juice related to security deposits?

A: Mitch Gershman.

Q: And how would he instruct you to do so?

A: Verbally. And with the topic of the security deposits, this one I am—you know, these orders that would come from Mitch would come with the attachment, you know, Dan wants this, Dan wants that.

Q: Dan Snyder?

A: Dan Snyder. Dan doesn't want to give the money back.

...

Q: Did you stand to personally benefit from the practice of failing to return security deposits to accountholders?

A: Absolutely not.

Q: Was your compensation in any way tied to the failure to return security deposits to accountholders?

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<sup>26</sup> *Id.*

<sup>27</sup> *Id.*

<sup>28</sup> *Id.*



A: Absolutely not.

Q: To your knowledge, who, if anyone, would stand to benefit from the practice of failing to return security deposits to accountholders?

A: Redskins ownership, including Daniel Snyder.<sup>29</sup>

According to Mr. Friedman, the practice of “juicing” security deposits ended in or around 2017 after Mr. Snyder, through Stephen Choi, the Commanders’ former Chief Financial Officer (CFO), directed Mr. Friedman to stop. Specifically, Mr. Friedman stated that Mr. Choi instructed him:

Dan doesn’t want us to mess with it anymore. Just leave it alone. Don’t touch any of the money. Don’t try and get it back to the customers, don’t try and convert it into juice, just leave it alone.<sup>30</sup>

Mr. Friedman explained:

I think that they had gotten a little bit concerned that maybe some people were onto them here. And that really—that stopped en masse, you know, I would say probably three, four years ago, maybe five years ago.<sup>31</sup>

### ***Documentation of Retained Security Deposits***

According to information and documents collected by Mr. Friedman, the Commanders tracked and stored information related to customers’ security deposits in an electronic ticketing and accounting database. This database included customer contact information, the seats purchased under customers’ multi-year contracts, the types of seats purchased, the amount of the deposit paid, and other information.

The Committee has reviewed internal information provided by Mr. Friedman that he exported from the Commanders’ electronic database. This information appears to reflect the following categories of information: the names and contact information of approximately 2,000 customers, including companies, who paid security deposits; the security deposits collected by the team that had not been returned to customers or converted into “juice;” and the security deposits that the Commanders had either returned to customers, retained due to customer default or for other reasons, or that had been converted into “juice.” The following is an excerpt from the spreadsheet that reflects customers whose security deposits had not been refunded or turned into “juice” by the Commanders as of July 2016:

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<sup>29</sup> *Id.*

<sup>30</sup> *Id.*

<sup>31</sup> *Id.*

num_seat	acct_id	owner_name	zip	add_datetime	price_code	purchase_price	block_purch	full_price	paid_amount	acct_rep_id	acct_rep_full_name	acct_type_desc
4	3057406			20001	8/2/2000 A	498.75	1995	498.75	1995	1624320	Mr. Jason Friedman	Corporate
2	3057091			23451	3/17/2000 D	348.75	697.5	348.75	697.5	15296798		Personal
2	3039065			20011	5/25/2000 D	348.75	697.5	348.75	697.5	10403667		Personal
4	3057695			20190	7/13/2000 D	348.75	1395	348.75	1395	2528304		Personal
2	3056457			20005	8/2/2000 D	348.75	697.5	348.75	697.5	2701763		Corporate
2	3045187			22027	7/18/2000 E	248.75	497.5	248.75	497.5	1624320	Mr. Jason Friedman	Personal
2	3065383			19971	5/17/2001 E	248.75	497.5	248.75	497.5	1624320	Mr. Jason Friedman	Personal
1	3059147			20817	10/16/2002 T06	30000	90000	30000	30000	199	Redskins Customer Service	Corporate
1	3037242			20006	8/9/2000 T11	90000	90000	90000	90000	199	Redskins Customer Service	Personal
1	3045427			66251	8/24/2000 S60	90000	90000	90000	90000	1633248		Corporate
1	3059394		22102-4219	22102-4219	1/11/2005 O1	70000	70000	70000	70000	1877399	Mr. Dennis Greene	Corporate
1	1079764			21075	1/31/2001 S65	37500	37500	37500	37500	1624320	Mr. Jason Friedman	Corporate
1	3066118			20850	6/13/2001 S67	31250	31250	31250	31250	1877399	Mr. Dennis Greene	Corporate
1	3063180			20191	2/5/2002 O3	55000	55000	55000	55000	1633248		Sponsor
1	3067728			20005	9/20/2001 S63	20000	20000	20000	20000	199	Redskins Customer Service	Corporate
1	3025254			20190	3/3/2005 O5	30000	30000	30000	30000	199	Redskins Customer Service	VIP
1	3073346			22102	5/17/2002 S10	56250	56250	56250	56250	1877399	Mr. Dennis Greene	Corporate
1	3059394		22102-4219	22102-4219	7/23/2002 S18	75000	75000	75000	75000	1877399	Mr. Dennis Greene	Corporate
1	3080556			20878	12/10/2002 O1	56784	56784	56784	56784	1877399	Mr. Dennis Greene	Personal
1	3080663			20011	2/6/2003 S03	8000	8000	8000	8000	1877399	Mr. Dennis Greene	Corporate
1	3080671			20166	2/6/2003 S04	7000	7000	7000	7000	1877399	Mr. Dennis Greene	Corporate
1	3083642			20814	7/9/2003 S10	22750	22750	22750	22750	1877399	Mr. Dennis Greene	SponsorOther
1	3088427			22150	4/30/2004 O02	50000	50000	50000	50000	1877399	Mr. Dennis Greene	Corporate
1	3089790			20774	5/6/2004 O04	15942	15942	15942	15942	2701763		Corporate
1	3122788			20770	2/18/2009 S02	20280	20280	20280	20280	1877399	Mr. Dennis Greene	Corporate
1	3079440			20171	2/20/2004 S07	21632	21632	21632	21632	1624320	Mr. Jason Friedman	Corporate
1	3081125			22124	2/23/2005 S22	7171.11	7171.11	7171.11	7171.11	1877399	Mr. Dennis Greene	Corporate
1	176859			22030	3/22/2004 S11	25688	25688	25688	25688	1624320	Mr. Jason Friedman	Corporate
1	3089813			30004	3/29/2004 S02	20280	20280	20280	20280	1877399	Mr. Dennis Greene	Corporate
1	3091223			22102	6/2/2004 S14	38000	38000	38000	38000	1877399	Mr. Dennis Greene	Corporate
1	3122788			20770	2/18/2009 S15	697.5	697.5	697.5	697.5	1877399	Mr. Dennis Greene	Corporate
1	3122788			20770	2/18/2009 S15	697.5	697.5	697.5	697.5	1877399	Mr. Dennis Greene	Corporate
1	3122788			20770	2/18/2009 S16	1046.25	1046.25	1046.25	1046.25	1877399	Mr. Dennis Greene	Corporate
1	3019414			20175	2/24/2005 O01	14990	14990	14990	14990	1624320	Mr. Jason Friedman	Corporate
1	3036582			22153	8/1/2005 O05	10000	10000	10000	10000	1624320	Mr. Jason Friedman	Vendor
1	3097317			20006	4/12/2005 S04	20000	20000	20000	20000	1877399	Mr. Dennis Greene	Corporate
1	3027813			20166	4/21/2005 S05	12992.5	12992.5	12992.5	12992.5	1624320	Mr. Jason Friedman	Corporate

As illustrated in the spreadsheet, customer names are reflected under the “owner\_name” column, and the amount of unreturned security deposits per customer is reflected in the “paid\_amount” column.

According to the spreadsheet, one customer name that corresponds to two season tickets appears to have been registered in the name of current NFL Commissioner Roger Goodell as of July 2016. The amount of the unreturned deposit is approximately \$1,000. The address for this account is listed as the NFL’s corporate address in New York. According to the spreadsheets, the security deposit appears to have been collected prior to Mr. Goodell’s election as NFL Commissioner in 2006. The Committee has not determined when the security deposit was paid or whether it has since been returned.

2	782649	Goodell, Roger	10154	1/8/1999 A	498.75	997.5	498.75	997.5	1624320	Mr. Jason Friedman	NFL
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In addition, the spreadsheets also appear to reflect security deposits for 28 seats held at various times by the NFL (in blocks of four and six seats). The amount of unreturned security deposits for these seats as of 2016 is listed as approximately \$13,000. Below is sample of those accounts:

6	3011452	NFL	10154	1/8/1999 A	498.75	2992.5	498.75	2992.5	1624320	Mr. Jason Friedman	NFL
6	3011452	NFL	10154	1/8/1999 A	498.75	2992.5	498.75	2992.5	1624320	Mr. Jason Friedman	NFL
4	3011452	NFL	10154	1/8/1999 A	498.75	1995	498.75	1995	1624320	Mr. Jason Friedman	NFL

Based on Mr. Friedman’s interview and the information reviewed by the Committee, it appears that Mr. Friedman has identified approximately 2,000 customers who paid deposits totaling approximately \$5 million whose money the Commanders appear to not have returned as

of 2016. The spreadsheets reviewed by the Committee do not indicate why these deposits were unreturned as of 2016 or whether each of these customers was entitled to a refund.<sup>32</sup>

When asked why he collected this information in 2016, Mr. Friedman stated:

It's for a similar reason that I collected this other information. I knew what we were doing was wrong, and I wanted to have record of it in case something went sideways.<sup>33</sup>

The Committee will provide the Excel spreadsheets obtained from Mr. Friedman to the FTC upon request.

### *Concealing Ticket Revenue from the NFL*

Mr. Friedman also provided information and documents indicating that Commanders executives repeatedly concealed ticket sales revenue that should have been shared with the NFL. He explained that, in or around 2012, as the team approached the end of a 15-year waiver of the NFL's revenue-sharing requirements, Commanders executives began implementing additional business practices to conceal revenue that would become subject to revenue-sharing.<sup>34</sup>

According to Mr. Friedman, in 1997, two years prior to Mr. Snyder's purchase of the Washington Commanders, the NFL granted former owner Jack Kent Cooke a 15-year club seat revenue-sharing waiver that capped the amount of revenue the team was required to share with the League. Mr. Friedman further explained, consistent with documents he provided, that after the waiver expired, Commanders executives began intentionally underreporting ticket revenue in the team's electronic database that should have been shared with the League. The executives apparently accomplished this by falsely processing or misassigning a portion of ticket revenues from Commanders games as fees related to special events, such as concerts or college football games, which were not subject to revenue sharing with the NFL.<sup>35</sup>

In a May 6, 2014, email, Commanders executives appear to discuss a plan to process a portion of the revenue from Commanders game tickets as bogus licensing fees related to a

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<sup>32</sup> Mr. Friedman explained in his interview that the team may have retained deposits from a small portion of these customers due to default, but that the approximately \$5 million in unreturned deposits also excludes amounts that were retained and converted into "juice." He stated: "So some of that \$5 million the team is entitled to retain because the licensee defaulted. But over the years, there was a scheme where we took security deposits from dormant accounts and turned it into juice. And that's not reflected in that \$5 million, because the file, the list of the \$5 million doesn't show money that's been taken out of the security deposit and converted into juice." Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

<sup>33</sup> *Id.*

<sup>34</sup> Letter from Jason Friedman to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20J.%20Friedman%20to%20CBM%20%28Redacted%29.pdf>).

<sup>35</sup> *Id.*; Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

Navy-Notre Dame college football game at FedEx Field.<sup>36</sup> In the email, Mr. Friedman requested guidance from Mr. Choi on how to process the additional ticket sales revenue, writing:

(Stephen – can you reply all with processing guidance? This is the bulk club sro [standing room only] order where I am charging \$55 per ticket, but the tickets are priced at \$44 in the system. There are a total of 14,760 game tickets being sold here with \$11 per ticket of juice = \$162,360)

Mr. Choi responded, “The juice goes to Navy vs ND game,” which according to Mr. Friedman meant that a portion of the revenue from the Commanders game tickets—\$162,360—should be falsely processed as a non-shareable revenue from the Navy vs. Notre Dame college football game.<sup>37</sup>

Mr. Friedman explained that this was a recurring practice by Commanders executives:

A: Well, in this particular case and other cases similar to this, \$162,360 was shielded from the NFL revenue sharing program; that even though we sold \$811,800 worth of tickets, we reported that sale to the NFL at a total of \$721,600, leaving \$162,360 of juice, of money that would just go right into the owner’s pocket and didn’t have to be exposed to the NFL revenue sharing program.

Q: Was this the only time that you identified juice for the company?

A: No.

Q: Do you recall how often this would happen?

A: Frequently. I don’t know if—well, each time it happened related to this type of activity, it was substantial, hundreds of thousands of dollars usually. How many times it happened, I would estimate that this exact type of activity happened probably at least a dozen times.<sup>38</sup>

According to Mr. Friedman, the Commanders avoided detection of these practices by failing to adjust in their ticket manifests the higher prices charged for tickets—here \$55 rather

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<sup>36</sup> Email from Jason Friedman to Stephen Choi et al. (May 6, 2014) (describing the bulk sale of Commanders’ full season and home game tickets against New York Giants, Seattle Seahawks, Philadelphia Eagles, and Dallas Cowboys) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/May%202014%20Email%20%28Redacted%29.pdf>); see also *FedEx Field to Host Navy vs. Notre Dame in 2014*, SB Nation (Dec. 13, 2012) (online at <https://dc.sbnation.com/2012/12/13/3763170/navy-notre-dame-2014-fedex-field>).

<sup>37</sup> Email from Stephen Choi to Jason Friedman et al. (May 6, 2014) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/May%202014%20Email%20%28Redacted%29.pdf>).

<sup>38</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

than the \$44 reflected in the manifest.<sup>39</sup> The unreported revenue collected by the Commanders, or “juice,” would then be assigned as non-sharable revenue in its accounting systems and concealed from the NFL. Mr. Friedman explained:

A: So our stadium has a manifest similar to a manifest that you would see for airplane seating, and each seat has a dollar amount assigned to it. In this particular case, the dollar amount assigned to each one of these seats in the manifest was \$44; but in fact we collected \$55 per seat from this customer, times 14,760 seats times \$11 per seat equals \$162,360, which that amount would then be allocated to a different type of line item in our database, a line item that was not exposed to NFL revenue sharing.

Q: What types of line items would the team use to disguise that revenue?

A: Primarily, license fees, interest fees, and handling fees.<sup>40</sup>

As part of this scheme, the Commanders reportedly maintained two sets of books: one that was shared with the NFL but underreported certain ticket revenue, and another internal set of books that included the complete and accurate revenue and was “shown to Mr. Snyder.”<sup>41</sup>

This practice appears to be reflected in the May 6, 2014, email chain discussed above. In one email, Mr. Choi wrote to a senior finance employee: “[Redacted]—I would start the list of adjustments for FY [fiscal year] 15 (reclass Navy game to PSS [premium seat sales] dept).”<sup>42</sup> Mr. Friedman explained this accounting practice during his interview:

Q: What do you understand Mr. Choi to be referring to when he says “start the list of adjustments for FY15”?

A: So this is the two sets of books. So in this particular case, there’s a set of books that’s submitted to the NFL that doesn’t include the \$162,000, but then there’s a set of books that’s kept internally shown to Mr. Snyder and Mr. Snyder’s—I believe just Mr. Snyder, actually, and the people in his inner circle maybe, that shows what we actually did, which would include the \$162,000 of

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<sup>39</sup> See also Letter from Jason Friedman to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (explaining that NFL auditors would likely focus their audits on information in the system related to game tickets rather than other events that are not subject to revenue-sharing requirements such as college football games) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20J.%20Friedman%20to%20CBM%20%28Redacted%29.pdf>).

<sup>40</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

<sup>41</sup> *Id.*

<sup>42</sup> Email from Stephen Choi to Jason Friedman et al. (May 6, 2014) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/May%202014%20Email%20%28Redacted%29.pdf>).

juice.

Q: Who maintained these books?

A: Stephen Choi and [redacted].

Q: So when he is instructing [redacted] to start the list of adjustments, he's referring to the books that would reflect juice; is that correct?

A: Well, there's going to be a set of files that's submitted to the NFL that is going to be, in this case, \$162,000 light.

Q: Okay.

A: Then there's the set of books that we keep that are for us only that will reflect the \$162,000 of Redskins ticket money and at the same time also reduce the inflated Navy Notre Dame license fee number.

Q: So the list of adjustments is referring to both of those?

A: Yes.

Q: When Mr. Choi says "reclass Navy game to PSS department," what is PSS?

A: Premium seat sales.

Q: Your department?

A: Yes.

Q: What's the significance, if any?

A: Well, there was a department in charge of selling special event tickets, a very small department, that had this adjustment not been made internally, their number would have been inflated and the premium seating sales number would have been deflated. So because this was a semi regular practice, we wanted to make sure that we were keeping track of what was actually happening, and that we didn't want to be referring back to the tainted books that had been submitted to the NFL.<sup>43</sup>

In an April 1, 2013, email obtained by the Committee, Commanders executives appear to discuss intentionally processing \$88,000 in shareable revenue from Commanders' game tickets as bogus, non-shareable licensing fees for an unrelated May 25, 2013, Kenny Chesney

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<sup>43</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

concert at FedEx Field.<sup>44</sup> In the email, Mr. Friedman confirmed that the \$88,000 would be processed as Kenny Chesney licensing fees even though the accountholder had not purchased Kenny Chesney tickets. Mr. Friedman wrote:

I ran a large payment for account 2837245 today. Per our last email exchange, I paid off the 88K of KC LI FEE (even though he is not getting any KC tickets).<sup>45</sup>

During his interview with Committee staff, Mr. Friedman explained:

Q: In the body of the email, it refers to account 2837245. What is that referring to?

A: That's going to be a—sorry, that's going to be a ticket broker account.

Q: In the same email, KC, is that referring to Kenny Chesney?

A: It is.

Q: The LI fee, is that referring to licensing fee?

A: Yes, ma'am.

Q: At the end of the sentence, you say, "(even though he is not getting any KC tickets)." What do you mean by that?

A: Well, I don't have a record of us—this next type of transaction, I don't have a document. But there would be times where a ticket broker would come forward to buy \$100,000 worth of Redskins tickets, let's say as an example, and we would give that ticket broker \$100,000 of Redskins tickets. But then we would also give them, say, \$50,000 of special event tickets that we were having maybe a tough time selling, a college football game or a soccer game or something like that.

And we would actually give those special event tickets to the ticket broker because it was of no cost to us. That would allow us then to book in our system \$50,000 of Redskins tickets and \$50,000 of special event tickets, thus shielding \$50,000 from league revenue sharing. And in those cases, we would actually issue the tickets out to the ticket broker, as an example. But in this

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<sup>44</sup> Email from Jason Friedman to Jeff Ritter et al. (Apr. 1, 2013) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/April%202013%20Email%20%28Redacted%29%20Final.pdf>); see also Washington Commanders, *Chesney Returns to FedEx Field in 2013* (Nov. 8, 2013) (online at [www.commanders.com/news/chesney-returns-to-fedexfield-in-2013-8782001](http://www.commanders.com/news/chesney-returns-to-fedexfield-in-2013-8782001)).

<sup>45</sup> Email from Jason Friedman to Jeff Ritter et al. (Apr. 1, 2013) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/April%202013%20Email%20%28Redacted%29%20Final.pdf>).

case, we allocated money to Kenny Chesney license fee, not Kenny Chesney tickets, and didn't give the customer any Kenny Chesney tickets. That's why I was explicit there in explaining that.

...

A: And, in short, the practice here is exactly the same as the prior email we were just reviewing with a lot less detail. But the net result in this case is 88,000 of juice, and the event was a Kenny Chesney concert instead of a Navy Notre Dame college football game.<sup>46</sup>

When asked by Committee staff why he copied team executives on emails involving the Commander's "juicing" revenue schemes, Mr. Friedman candidly explained:

A: Well, because Mitch was my supervisor at the time, Stephen was our CFO. And I wanted there to be a paper trail. If I were to one day get accused again of being a lazy, rogue employee, I wanted to make sure I had something that showed that I was just doing what I was told.<sup>47</sup>

Mr. Friedman further explained why he retained the documents provided to the Committee. He stated:

A: Well, again, I retained these emails because I did not want to be—I knew what was happening in these emails was wrong, and I did not want to be hung out to dry by the team again and have someone come back and make the claim that I was doing this on my own.<sup>48</sup>

Mr. Friedman also provided that, despite his lengthy tenure with the team, he remained concerned that he would lose his job if he failed to perform his job duties in a manner consistent with Mr. Snyder's expectations:

I was always worried about losing my job there, always. You would think working someplace for 24 years that you would gain some sort of comfort in job security. But I was very paranoid just because I saw so many people over the years get fired that I—I was always worried that I would be next.<sup>49</sup>

Mr. Friedman's practice of retaining documents was confirmed by Rachel Engleson, the team's former Director of Marketing and Client Relations, who wrote to the Committee that during the period from 2012 to 2018 when she reported to Mr. Friedman, he repeatedly informed her that he had "started to keep printed emails and/or other materials to show that, in

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<sup>46</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

<sup>47</sup> *Id.*

<sup>48</sup> *Id.*

<sup>49</sup> *Id.*



performing certain parts of his job, he was acting under orders of his supervisor and Dan Snyder.” Ms. Engleson continued:

He explained to me that he had been made into a scapegoat by the company for other things he and others had done under orders of the team’s leaders, and so after that he started keeping records whenever he was asked to do tasks that he and/or the team could potentially be sued for.<sup>50</sup>

Ms. Engleson also confirmed that “it was known and/or rumored in the office that there was ‘moving around’ of money regarding tickets,” and stated that she had informed Beth Wilkinson’s team of this during an interview in 2020.<sup>51</sup>

### ***Misleading Customers to Sell Higher-Priced Tickets***

According to Mr. Friedman, his concerns about being used as a scapegoat by the team and blamed for the Commanders’ financial improprieties were based on an earlier experience. During his interview, he stated that in 2009, former General Counsel Dave Donovan accused him of being a “rogue employee” after he had followed directives to mislead Commanders fans about ticket availability and steer fans to buy more costly seating.<sup>52</sup>

Specifically, according to Mr. Friedman, team executives including Mr. Gershman and Mr. Choi had routinely instructed him to misrepresent the availability of affordable general admission tickets to fans seeking to attend Commanders’ games. Mr. Friedman would inform these customers that the team had sold out of general admission tickets while at the same time, he would sell those tickets to ticket brokers in bulk. He would then direct fans to the team’s purported 160,000-name waitlist.<sup>53</sup> The apparent intent of this practice was to trick customers into believing that they had two choices: join the waiting list or purchase premium-priced tickets for access to immediate seating in FedEx Field.<sup>54</sup>

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<sup>50</sup> Letter from Rachel Engleson to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20R.%20Engleson%20to%20CBM%20%28Redacted%29.pdf>).

<sup>51</sup> *Id.*

<sup>52</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022); *Redskins Sold Brokers Tickets Despite Wait List*, Washington Post (Sept. 2, 2009) (online at [www.washingtonpost.com/wp-dyn/content/article/2009/09/01/AR2009090103984.html?hpid=topnews&sid=ST2009090104025](http://www.washingtonpost.com/wp-dyn/content/article/2009/09/01/AR2009090103984.html?hpid=topnews&sid=ST2009090104025)) (describing Mr. Friedman as one of the employees responsible for selling general admission tickets to ticket brokers).

<sup>53</sup> Letter from Jason Friedman to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (explaining that the waitlist was used as a marketing tool and in many cases did not reflect customers interested in purchasing tickets) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20J.%20Friedman%20to%20CBM%20%28Redacted%29.pdf>).

<sup>54</sup> *Id.* (“At many points, for extended periods of time, reasonably priced, upper and lower-level seats would be unsold, but this information was deliberately withheld from fans as a tactic to force fans to buy much more expensive premium club seats.”).

Around the same time, the Commanders, led by Mr. Donovan, sued hundreds of fans and other leaseholders who fell behind on payments despite recouping potential losses by reselling the same seats to brokers. When these questionable practices were subsequently exposed in public reports, team executives, including Mr. Donovan, openly blamed employees like Mr. Friedman.<sup>55</sup> Mr. Friedman explained:

So when questioned about the act of selling tickets to ticket brokers, which was part of my assigned duties, Mr. Donovan referred to me as a rogue employee and that I was doing that because I was lazy, which is not true. I was doing that because that was what I was told to do. And the selling of tickets to ticket brokers was something that was a sanctioned activity, but the team at that time wanted to portray it as something that the team had no knowledge of.<sup>56</sup>

Publicly, Commanders' leadership stated "that the sales were made but said they were against team policy" and that "the ticket sales employees involved were disciplined."<sup>57</sup> However, Mr. Friedman told Committee staff that privately, Commanders leadership rewarded him. When asked if he was ever disciplined for his actions, he stated: "No. In fact, shortly thereafter I received a raise" from Mr. Gershman and Mr. Donovan.<sup>58</sup> According to Mr. Friedman, Mr. Gershman subsequently informed him that Mr. Snyder wanted him to resume selling tickets to brokers using the same deceptive tactics he had previously employed.<sup>59</sup>

Mr. Friedman further explained that, although he had not acted on his own, Mr. Gershman advised him to send Mr. Snyder a letter claiming to take full responsibility for the directives of team executives:

Q: Did you ever communicate with Mr. Snyder about the accusations that were detailed in that Washington Post story?

A: Yes, I did.

Q: How so?

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<sup>55</sup> *Redskins Sold Brokers Tickets Despite Wait List*, Washington Post (Sept. 2, 2009) (online at [www.washingtonpost.com/wp-dyn/content/article/2009/09/01/AR2009090103984.html?hpid=topnews&sid=ST2009090104025](http://www.washingtonpost.com/wp-dyn/content/article/2009/09/01/AR2009090103984.html?hpid=topnews&sid=ST2009090104025)).

<sup>56</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

<sup>57</sup> *Redskins Sold Brokers Tickets Despite Wait List*, Washington Post (Sept. 2, 2009) (online at [www.washingtonpost.com/wp-dyn/content/article/2009/09/01/AR2009090103984.html?hpid=topnews&sid=ST2009090104025](http://www.washingtonpost.com/wp-dyn/content/article/2009/09/01/AR2009090103984.html?hpid=topnews&sid=ST2009090104025)).

<sup>58</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

<sup>59</sup> *Id.*; see also Letter from Jason Friedman to Chairwoman Carolyn B. Maloney, Committee on Oversight and Reform (Apr. 8, 2022) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/Apr082022%20Letter%20from%20J.%20Friedman%20to%20CBM%20%28Redacted%29.pdf>).

A: In the following weeks, Mitch suggested that I send Mr. Snyder an apology letter taking full responsibility for what had happened and claiming that I acted alone.

...

Q: And do you recall what you said in the letter?

A: I do. The main points were I acted alone, and my intentions were good, but my judgment was bad and that I was very sorry.

Q: And I believe you just said that you didn't believe that you acted alone.

A: No, I didn't act alone.<sup>60</sup>

### ***Request for Review***

Mr. Friedman, who worked for the Commanders for more than two decades, explained that he provided information to the Committee because he viewed it as his duty to inform the public about the Commanders' potentially unlawful business practices under the leadership of Dan Snyder. He explained:

But I am here today because when the government approached me, I decided that I wanted to tell the truth and that I was not going to lie to protect Daniel Snyder anymore.<sup>61</sup>

He added:

I'd like those folks to get their money back. That through—and this is just my opinion—that through all of this, at the top of the priority list is the victimized women, and a close second are these customers that had their hard-earned money stolen from them.<sup>62</sup>

Based on the troubling practices described herein, we are sharing the information and documents provided to the Committee and will make available upon request the spreadsheets provided by Mr. Friedman to determine whether additional investigation is warranted and, if so, take any appropriate measures to ensure that the thousands of potential victims of this conduct receive any compensation they are due.

Thank you for your attention to this important matter.

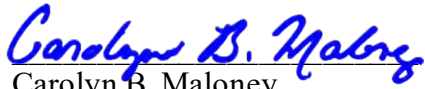
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<sup>60</sup> Committee on Oversight and Reform, Transcribed Interview of Jason Friedman (Mar. 14, 2022).

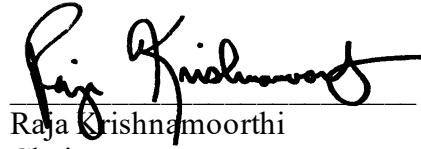
<sup>61</sup> *Id.*

<sup>62</sup> *Id.*

Sincerely,



Carolyn B. Maloney  
Chairwoman  
Committee on Oversight and Reform



Raja Krishnamoorthi  
Chairman  
Subcommittee on Economic and  
Consumer Policy

cc: The Honorable James Comer, Ranking Member  
Committee on Oversight and Reform

The Honorable Michael Cloud, Ranking Member  
Subcommittee on Economic and Consumer Policy

Mr. Jason S. Miyares, Attorney General  
Commonwealth of Virginia

Mr. Brian E. Frosh, Attorney General  
State of Maryland

Mr. Karl A. Racine, Attorney General  
District of Columbia

Mr. Roger Goodell, Commissioner  
National Football League, Inc.